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Hearing Date: June 9, 2016
Hearing Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

97-111 Hale, LLC, and
100-114 Hale, LLC,

Chapter 11
Lead Case No. 15-22381 (RDD)

Debtors.

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NOTICE OF DEBTORS' MOTION FOR AN ORDER (I) FINDING THAT GRAND PACIFIC FINANCE CORP. VIOLATED OF THIS COURT'S STAY ORDER DATED DECEMBER 3, 2015; (II) HOLDING THAT GRAND PACIFIC'S MOTION IN THE STATE COURT AGAINST THE BOBKERS IS INVALID, VOID *AB INITIO* AND/OR MUST BE WITHDRAWN AND/OR THAT ANY RELIEF THAT THE STATE COURT MAY GRANT WITH RESPECT TO SUCH MOTION IS INVALID AND VOID *AB INITIO*, AND (III) GRANTING SANCTIONS, LEGAL FEES AND COSTS

PLEASE TAKE NOTICE, that Debtors, 97-111 Hale, LLC and 100-114 Hale, LLC ("Debtors"), by their attorneys DelBello, Donnellan, Weingarten, Wise & Wiederkehr, LLP, will move this Court before the Honorable Robert D. Drain, 300 Quarropas Street, White Plains, New York on June 9, 2016 at 10:00 a.m., or such earlier or other date as may be set by the Court, for an order (i) finding that the Claimant, Grand Pacific Finance Corp. ("Grand Pacific") violated, and continues to violate, this Court's stay order dated December 3, 2015 (Dkt. 53)) by filing, and maintaining, a motion in the New York state court Collection Lawsuit requesting the incarceration of the Bobkers (the "Incarceration Motion") when the Foreclosure Trial had not yet

concluded,¹ (ii) holding that the Incarceration Motion is invalid, void *ab initio* and/or must be withdrawn and/or holding that any relief that the state court may grant with respect to such motion is invalid and void *ab initio*, (iii) granting sanctions, and legal fees and costs resulting from the violation, including the fees and costs of the Debtors' February 16, 2016 letter to the Court, this Motion and related services in connection therewith, and (iv) granting the Debtors such other and further relief and may be just under the circumstances.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief requested in the Motion must be made in writing, filed with the Court on the Court's Electronic Case Filing System, at www.ecf.nysb.uscourts.gov (login and password required), with a copy delivered directly to Chambers and served upon counsel to the Debtors, DelBello Donnellan Weingarten Wise & Wiederkehr, LLP, One North Lexington, 11th Floor, White Plains, New York 10601, Attn: Steven R. Schoenfeld, Esq. and Jonathan S. Pasternak, Esq so as to be received no later than seven (7) days prior to the hearing or such earlier date as may be set by the Court.

Dated: White Plains, New York
March 7, 2016

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By: /s/ Steven R. Schoenfeld
Steven R. Schoenfeld
Jonathan S. Pasternak

¹ We use the same capitalized defined terms in this letter that are defined in the Court's Stay Order.